

M1037/0088
CC: Tom
Task: 3906



Mr. Rebecca Doolittle
US Bureau of Land Management
82 East Dogwood
Moab Utah 84532

March 30, 2011

Mr. Tom Munson
Utah Division of Oil, Gas, & Mining
1594 West North Temple Suite 1210
Salt Lake City, UT 84114-5801

Re: Response to Comments dated Jan 20, 2011. Mine Plan Modification: New Haul Road from GTO Pit to Heap Leach Pad. Lisbon Valley Mining Company LLC. 920 South County Road 313, La Sal, Utah, 84530.

Dear Becky:

The Lisbon Valley Mining Co LLC (LVMC) respectfully submits this response to the BLM's above-referenced comments. Our response is formatted as bullets in accordance with each comment received.

Technical Approach

- The material is run-of-mine (ROM) gradation waste rock. This material will be end-dumped as fill for the proposed haul road. This is the same method used to construct all haul roads at the mine.
- The source rock for the GTO Haul Road consists of acid-neutralizing rock types from the Centennial Pit. This includes rock types, 3, 6, 7, and 8. Most will come from the high wall (Type 8). Rock types are described in Table 1.

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Lithology	Bed Number	Acid Generation Potential	Rock Type Designation
Quaternary Alluvium	1	-	1
Mancos Shale Formation	2	-	2
Upper Dakota Sandstone	3, 4, 5	-	3
Dakota Sandstone, coaly beds	6, 7, 8	+	4
Dakota Sandstone, shaley beds	9, 10	+	5
Lower Dakota Sandstone	11, 12, 13	-	6
Burro Canyon Formation	14, 15	-	7
Navajo & Wingate Sandstone	NA	-	8

Table 1

- The acid neutralization potential and chemical suitability of this material is documented by waste rock analyses which identify the acid-neutralization potential and potential dissolution of metals using the Meteoric Water Mobility Procedure (MWMP).¹ The MWMP evaluates the dissolution of antimony, arsenic, uranium, cadmium, copper, molybdenum, selenium, and zinc by meteoric water.²
- 898,000 cubic yards is estimated to construct the haul road. The haul road width is 60 feet on flat grades. Where fill is required the width reaches 100 feet above the water tank and 400 feet below the water tank. The road is described further in the Technical Description Section. 30,600 cubic yards is estimated for the primary crusher wall. The areal dimensions of the crusher fill is approximately 600 x 300 feet. The fill volumes are for the haul road and crusher are included in Figures 1 and 2.
- The primary crusher wall reclamation will involve backfilling waste and grade the backfill to a 2.5:1 slope. It will be graded to blend with the surrounding landscape, top soiled and seeded.

¹ Resumption of Active Mining and Waste Rock Monitoring – 2010 Summary Report. Lisbon Valley Mining Company LLC. 920 South County Road 313, La Sal, Utah, 84530 14 March 2011

² Meteoric Water Mobility Procedure, Bureau of Mining Regulation and Reclamation, Nevada Division of Environmental Protection, 9/19/9

Revised Design

- The GTO Haul Road design improves on the pre-existing storm water retention basin constructed south of the heap leach pad by broadening the retention of storm water from sub basin 9A. This sub basin transmits a significant amount of water quickly from the southern benches of Lisbon Valley. Currently retention is provided by a small retention basin located south of the heap leach pad. The GTO Haul Road will replace this basin and increase the retention capacity from sub basin 9A. LVMC sub basins are delineated on Figure 4.

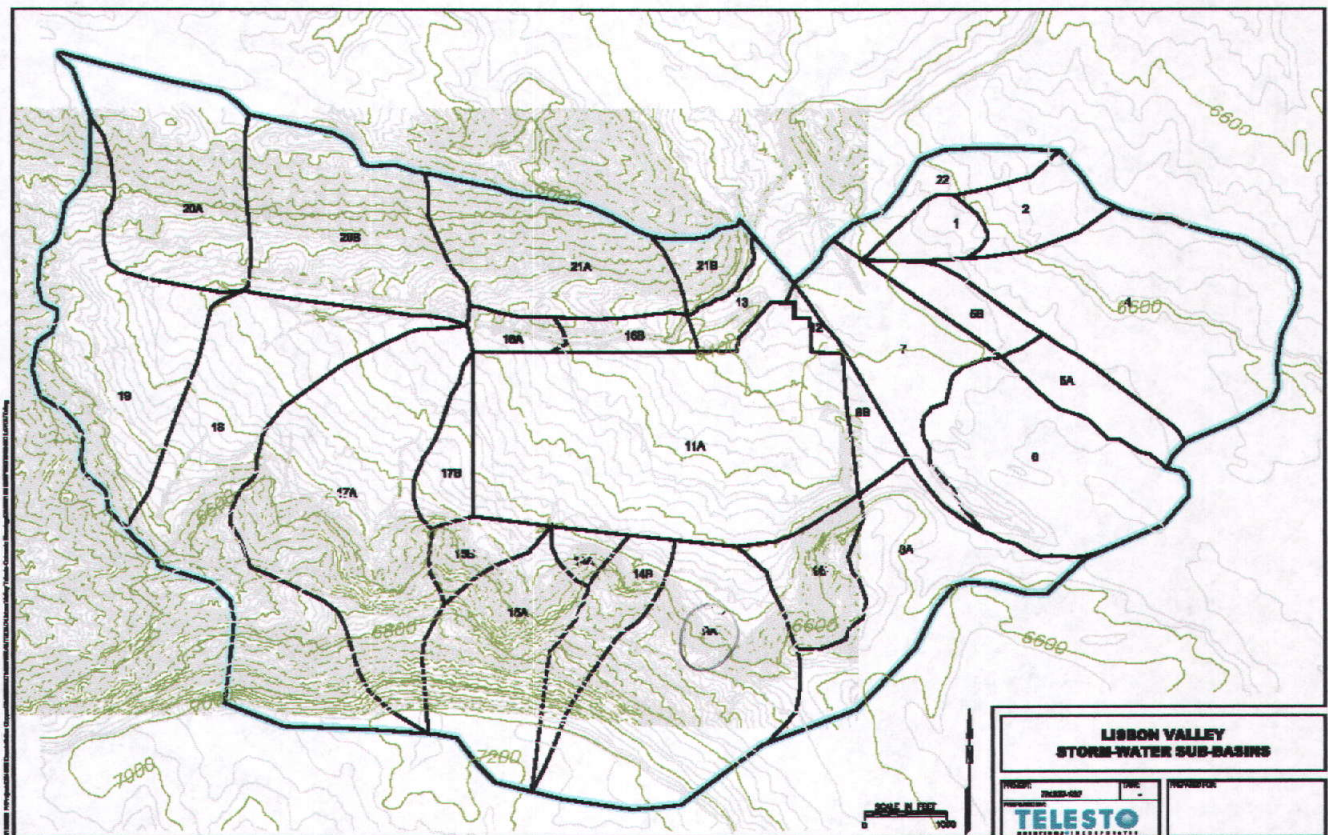


Figure 4

Technical Description

- The BLM's estimate of haul road length (0.4 mi) on BLM land compares with 0.35 miles per LVMC GIS. Haul road dimensions discussed in previous text and are shown in Figure 5.
- The water tank and water line are shown in Figure 5.

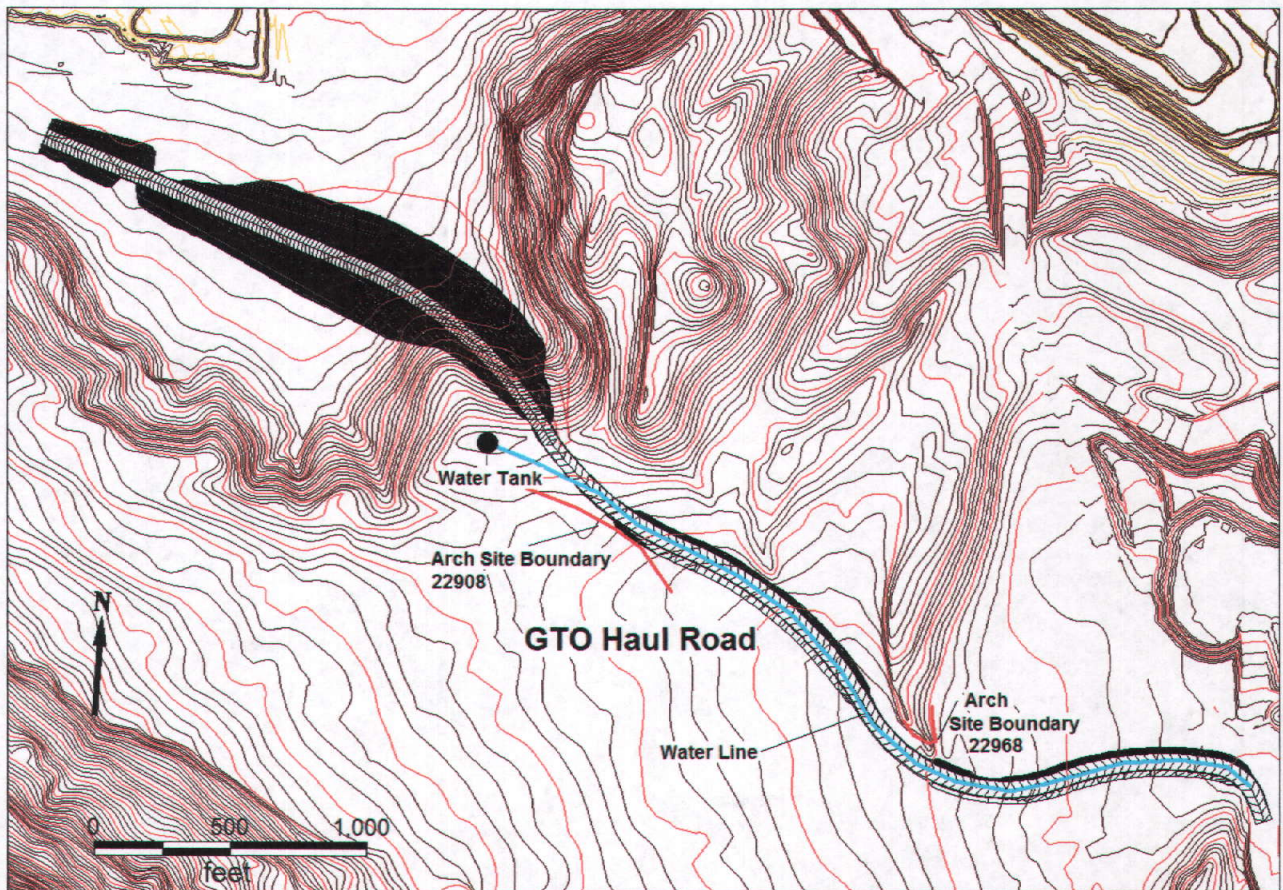


Figure 5

- Acid neutralizing rock will be used to construct the haul road. All material will be derived from the Centennial Pit.
- The GTO Haul road avoids closest archaeological sites 22968 and 22908. The boundaries of these sites closest to the haul road is shown in Figure 5.

Approval Request

The LVMC appreciates the agencies' ongoing guidance and support as the LVMC continues the planned mine expansion. We look forward to your review, approval, and written request to proceed. Please call Lantz Indergard at (435) 686 9950 #107 or email Lindergard@lisbonmine.com if additional information is needed.

Sincerely,



Lantz Indergard PG
Environmental Manager
Lisbon Valley Mining Co LLC